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June 26, 2019

*Via ECF*

Hon. Kimba M. Wood  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: United States v. Todd Kozel, 19 Cr. 460 (KMW)

Dear Judge Wood:

We respectfully submit this letter on behalf of Todd Kozel, to inform the Court that the Government and defense counsel have reached agreement with respect to a proposed modification of bail conditions in the above-referenced matter. The U.S. Pretrial Services Office also agrees with this proposal.

On June 25, 2019, we wrote to the Court to propose a modification of one bail condition—specifically, to request the removal of an ankle bracelet that provides electronic location monitoring ("GPS Monitoring"). We noted that Pretrial Services supported the request but that the Government did not. The Government has since informed us that it will agree to the removal of GPS Monitoring on the condition that the amount of the personal recognizance bond be increased from \$1 million to \$2 million (with no additional security beyond the \$1 million in cash already posted), with the revised bond to be co-signed by the existing sureties, Mr. Kozel's father and brother.

With this proposed modification, the bail conditions would be: (i) \$2 million personal recognizance bond secured by \$1 million in cash, co-signed by Mr. Kozel's father and brother; (ii) surrender of travel documents and no new applications; and (iii) travel restricted to the Southern District of New York, with travel also permitted to Pittsburgh, Pa., and Palm Springs, Calif., to visit family, if pre-approved by

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Pretrial Services, and with any other temporary travel requiring the consent of both the U.S. Attorney's Office and Pretrial Services.

We therefore request that the Court modify the bail conditions as set forth above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Meister /NL". The signature is fluid and cursive, with a large, stylized "M" and a trailing "NL" at the end.

David Meister  
Jocelyn E. Strauber  
Daniel Merzel  
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*Attorneys for Todd Kozel*

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